

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 1:24CR00063 SEP
)	
JASON HICKS-SIMPSON,)	
)	
Defendant.)	

GOVERNMENT’S SENTENCING MEMORANDUM

The parties agreed to jointly recommend a sentence of twenty (20) years imprisonment in the Federal Bureau of Prisons. A sentence of 20 years is sufficient but not greater than necessary, after fully considering the statutory sentencing factors set forth in 18 U.S.C. § 3553(a).

The present offense conduct is astoundingly disturbing and thoroughly detailed in the Presentence Investigation Report. Doc. No. 36, ¶s 12-19. The conduct for which Mr. Hicks-Simpson has plead guilty, Sexual Exploitation of a Minor for producing child pornography, involved capturing images and videos of himself sexually assaulting his autistic niece in 2023, when she was seventeen years old. Mr. Hicks-Simpson faces charges in state court in Butler County for the offenses of rape and sodomy against the victim. After he is sentenced in federal court, he will return to state court to answer for his charges there. With this knowledge, the Government agreed to the joint recommendation.

Mr. Hicks-Simpson has several felony and misdemeanor convictions from the State of Illinois, committed during his 20s and 30s, where he served prison and county jail sentences of two years or less. He is now 47 years old, and a sentence of 20 years will ensure that is in his upper 60s before he is ever released from federal incarceration. The victim will be an adult woman in her upper 30s.

Significantly, the victim's family is also the Defendant's family. This presents a heart-breaking situation for all the parties involved. In conversations with the victim's mother, she expressed that she loves her brother and is appreciative that he accepted responsibility by pleading guilty and not putting their family through a trial; however, the damage he did to her daughter, his niece, is irreparable and she will never be the same.

Respectfully submitted,

SAYLER FLEMING,
UNITED STATES ATTORNEY

/s/ Julie A. Hunter.
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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Matthew Radefeld,
Attorney for Defendant

Chelsea N. Sawyer
United States Probation Office

/s/ Julie A. Hunter
Julie A. Hunter
Assistant United States Attorney